UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

PREPARED FOOD PHOTOS, INC. f/k/a ADLIFE MARKETING & COMMUNICATIONS CO., INC.,

Plaintiff,

v. Case No.: 22-CV-642

NOFAL, LLC d/b/a FOOD TOWN MART and SHARIF JABER,

Defendants.

AFFIDAVIT IN SUPPORT OF W. TIMOTHY STEINLE'S MOTION TO WITHDRAW AS COUNSEL FOR THE DEFENDANTS, NOFAL LLC d/b/a FOOD TOWN MART AND SHARIF JABER

STATE OF WISCONSIN)
) ss
MILWAUKEE COUNTY)

- W. Timothy Steinle, being first duly sworn, states as follows:
- I am an attorney duly licensed to practice law in the State of Wisconsin. I
 represent the defendants, Nofal, LLC d/b/a Food Town Mart and Sharif Jaber in
 the above-referenced matter. I am providing this Affidavit in support of my
 Motion to Withdraw.
- 2. I was retained by Sharif Jaber d/b/a Food Town Mart on January 19, 2023.
- 3. Following the conclusion of the trial of this matter I wrote to my client, Sharif

 Jaber, on November 4, 2024 forwarding Mr. Jaber my invoice for services

 rendered through the conclusion of the trial as well as informing him of Plaintiff's

- Notice of Election of Damages. Following that letter I did *not* receive any contact from Mr. Jaber.
- 4. On November 18, 2024 I, again, wrote to Mr. Jaber asking him to provide payment for services rendered and informing him that I was unsure, given the lack of contact from plaintiff's counsel, whether or not plaintiff was planning on petitioning the Court for payment of his attorneys fees and costs in prosecuting this matter. Following that letter I did *not* receive any contact from Mr. Jaber.
- 5. On November 20, 2024 I forwarded Mr. Jaber a copy of Plaintiff's Motion for a New Trial and/or to Amend Judgment and asked Mr. Jaber to contact me to discuss the Motion. Following that letter I did *not* receive any contact from Mr. Jaber.
- 6. Despite not having had any communication with Mr. Jaber following the conclusion of this lawsuit, on December 4, 2024 this affiant filed Defendants, Nofal LLC d/b/a Food Town Mart and Sharif Jaber's Response in Opposition to Plaintiff's Motion for a New Trial and/or to Amend the Judgment (Doc. 59). I forwarded a copy of that Brief to Mr. Jaber again requesting that he contact me. Following that letter I did *not* receive any contact from Mr. Jaber.
- On December 11, 2024 I again wrote to Mr. Jaber asking him to contact me to discuss this matter. Following that letter I did *not* receive any contact from Mr. Jaber.
- 8. On December 26, 2024 I wrote to Mr. Jaber and forwarded him plaintiff's Reply Brief together with an updated invoice for services rendered. I again asked him to

- contact me to discuss this matter as well as his outstanding invoice for services rendered. Following that letter I did *not* receive any contact from Mr. Jaber.
- 9. On January 6, 2025 I wrote to Mr. Jaber and requested that he contact me regarding the pending Motion as well as the outstanding invoice for services rendered. Following that letter I did *not* receive any contact from Mr. Jaber.
- 10. On January 22, 2025 I again wrote to Mr. Jaber regarding his outstanding invoice for services rendered. Following that letter I did *not* receive any contact from Mr. Jaber.
- 11. On February 3, 2025 I again wrote to Mr. Jaber regarding his outstanding invoice for services rendered. Following that letter I did *not* receive any contact from Mr. Jaber.
- 12. On April 8, 2025 I wrote to Mr. Jaber informing him of the Court's decision on the plaintiff's pending Motion for a New Trial and/or to Amend the Judgment. At that time I informed him if he did not contact me I would be filing a Motion to Withdraw as counsel. Following that letter I did *not* receive any contact from Mr. Jaber.
- On April 21, 2025 I forwarded to Mr. Jaber the Bill of Costs and supporting documents filed by plaintiff's counsel on April 18, 2025. I asked him to contact me no later than May 1, 2025 to discuss this matter.
- 14. On April 22, 2025 I received plaintiff's Motion for Attorney's Fees. I forwarded a letter to Mr. Jaber requesting that he contact me no later than May 1, 2025 if he would like me to file a response to the pending Motion. I further informed him if I did not hear from him by that date I would take no further action on his behalf.

As of the drafting of this Affidavit I have not received any contact/communication from Mr. Jaber since the conclusion of the trial on October 29, 2024.

- 15. Without the ability to communicate with my client, I am unable to fulfill my legal and ethical obligations as his attorney and seek leave of this Court to withdraw as counsel of record.
- 16. As there are statutory time limitations under F.R.C.P. 54 and Civile L.R.54 within which to respond or object to the fees and costs, your affiant additionally moves this Court for an Order extending the time frame for the defendants to respond.

State Bar No.: 1003777

Subscribed and sworn to before me on this 1st day of May 2025

Notary Public, State of Wisconsin My commission expires: 3/14/2028

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